

Hearing Date & Time: _____, 2016 at ____ a.m. (Eastern Time)

Objection Deadline: _____, 2016

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GAWKER MEDIA LLC, et al.,

Debtors.¹

Chapter 11

Case No. 16-11700 (SMB)

(Jointly Administered)

**NOTICE OF MOTION OF MITCHELL WILLIAMS FOR AN ORDER (I) MODIFYING
THE AUTOMATIC STAY, FOR “CAUSE”, PURSUANT TO 11 U.S.C. § 362(d) TO
PERMIT AN APPEAL IN STATE COURT LITIGATION INVOLVING A PERSONAL
INJURY DEFAMATION CLAIM AGAINST DEBTOR; (II) AUTHORIZING A TRIAL
IN STATE COURT OF WILLIAMS’ PERSONAL INJURY DEFAMATION CLAIM
AGAINST DEBTOR, SOLELY TO ESTABLISH LIABILITY AND AMOUNT OF
WILLIAMS’ CLAIM; AND (III) GRANTING SUCH OTHER AND FURTHER RELIEF
AS MAY BE APPROPRIATE**

PLEASE TAKE NOTICE that on _____, 2016 at ____ a.m. (Eastern Time), or
as soon thereafter as counsel may be heard (the “**Hearing Date**”), Mitchell Williams, by and
through his undersigned counsel, Chiesa Shahinian & Giantomasi PC, shall move before the
Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at Courtroom 723 of the United
States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom
House, located at One Bowling Green, New York, NY 10004-1408 (the “**Bankruptcy Court**”),
for the entry of an order: (i) modifying the automatic stay, for “cause”, pursuant to 11 U.S.C. §

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Lft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

362(d) to permit an appeal in State Court litigation involving a personal injury defamation claim against debtor; (ii) authorizing a trial in State Court of Williams' personal injury defamation claim against debtor, solely to establish liability and the amount of Williams' claim; and (iii) granting such other and further relief as may be appropriate (the "**Motion**").

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, if any, must be in writing, shall conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General order M-399 and the User's Manual for the Electronic Case Filing System can be found at www.nysb.uscourts.gov), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard-copy delivered directly to Chambers), and shall be served upon Chiesa Shahinian & Giantomasi PC, One Boland Drive, West Orange, New Jersey 07052 attention: Robert E. Nies, Esq. so as to be actually received by _____, 2016 (the "**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served, the Court may grant the relief requested in the Motion without a hearing.

Respectfully submitted,

CHIESA SHAHINIAN & GIANTOMASI PC
Attorneys for Mitchell Williams

By: /s/ Robert E. Nies
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Dated: November 17, 2016